

60 PARK PLACE, SUITE 1100, NEWARK, NJ 07102 973-424-9777 WWW.KROVATIN.COM GERALD KROVATIN HENRY E. KLINGEMAN** HELEN A. NAU* ERNESTO CERIMELE* KRISTEN M. SANTILLO*

ALSO ADMITTED IN HI AND PA**
ALSO ADMITTED IN NY*

January 5, 2018

Honorable Alison J. Nathan United States District Court Southern District of New York Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007

Re: United States v. Trevon Gross, 15-cr-769 (AJN)

Dear Judge Nathan:

We represent Defendant Trevon Gross in the above-captioned matter. On March 3, 2016, Mr. Gross was released under pretrial supervision, and his travel is currently restricted to the Southern and Eastern Districts of New York and the Eastern District of Pennsylvania. Mr. Gross was scheduled to surrender to the Bureau of Prisons on January 8, 2018 to begin to serve his sentence, but the Second Court of Appeals has stayed his surrender date pending the outcome of Mr. Gross's motion for bail pending appeal. *See* Dkt. No. 696. No date has been set for argument on that motion. Mr. Gross seeks to modify the conditions of his release to permit him to travel to Kileen, TX from January 8-10, 2018 for a Pastors Conference. The government and Pretrial Services have no objection to this request. We are happy to answer any of the Court's questions or address any concerns. Thank you for your attention to this matter.

Respectfully submitted,

/s/Kristen Santillo Kristen Santillo

cc: AUSA Daniel Noble
AUSA Eun Young Choi
AUSA Won Shin
Officer Bernisa Mejia, Pretrial Services